

EXHIBIT A-8

MICHAEL J. LINDELL
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1 percent proof of your false claims, but you have never
2 produced any real evidence because it doesn't exist."

3 Do you see that?

4 A. Uh-huh.

5 Q. And Dominion indicated to you that at least it
6 asserted that your claims about the election being
7 stolen were false, correct?

8 A. They're claiming that I'm doing it to make
9 money, when at this point when this letter was written,
10 I had already lost \$150 million in about two months.

11 Q. Now, the second paragraph says, "Recently, you
12 announced your intention to release a documentary with
13 evidence of your false claims about Dominion. We write
14 to put you on formal notice of facts so that there is
15 absolutely no doubt at a future date about what was
16 known to you before you publish that documentary."

17 A. Uh-huh.

18 Q. Do you see that?

19 A. Yep.

20 MR. KACHOUROFF: Yeah, I'm going to object
21 to this letter as hearsay, and the notion that it
22 contains facts is debatable.

23 Q. (BY MS. WRIGLEY) And were you aware of this
24 formal notice that Dominion's lawyers sent to you on
25 Novem -- February 4th, 2021?

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1 A. This is -- I do -- I definitely read this one 03:37PM
2 because this is the one where they said don't you put 03:37PM
3 anything in there about Sidney Powell, or how about 03:37PM
4 Rudy. And I'm going, you know, if they're telling me 03:37PM
5 this documentary better not include that, I have Dennis 03:37PM
6 Montgomery's evidence that I had -- it had all been 03:37PM
7 validated. So this is all -- I looked at that and went 03:37PM
8 boy, aren't you going to be in for a surprise, Dominion. 03:37PM

9 Q. Do you see that it says in the last two 03:37PM
10 sentences of that paragraph, "These people lack any 03:37PM
11 relevant expertise about voting machines and election 03:37PM
12 security, and they are determined to promote a false, 03:37PM
13 preconceived narrative about the 2020 election. In 03:37PM
14 light of this, you are well aware that there are 03:37PM
15 countless people willing to put forward fake evidence of 03:38PM
16 fraud in the 2020 election, and that any evidence must, 03:38PM
17 therefore, be carefully scrutinized for liability before 03:38PM
18 you choose to broadcast it to a global Internet 03:38PM
19 audience"? Do you see that? 03:38PM

20 A. What -- yeah. 03:38PM

21 Q. And would you have agreed that it would be 03:38PM
22 important to carefully scrutinize evidence for -- 03:38PM

23 A. I did. 03:38PM

24 Q. -- reliability? 03:38PM

25 A. I did. I bet my life on -- 03:38PM

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1 Q. And you -- 03:38PM

2 A. I did my due diligence, and I'm still betting 03:38PM

3 my life on it. 03:38PM

4 Q. You carefully scrutinized -- 03:38PM

5 A. I'm a hundred percent right. 03:38PM

6 Q. -- Dennis Montgomery, sir? 03:38PM

7 A. What? 03:38PM

8 Q. You carefully scrutinized Dennis Montgomery? 03:38PM

9 A. A hundred percent. 03:38PM

10 Q. And you carefully scruti -- 03:38PM

11 A. I put my whole life on the line. I lost 03:38PM

12 everything because of it. And then Dominion's sitting 03:38PM

13 there going, oh, you -- I could have sat back. I was a 03:38PM

14 millionaire. Every dime's been spent now. Every dime 03:38PM

15 trying to save our country, every single dime. I got 03:38PM

16 one house, a \$6 million lien against it by the IRS. 03:38PM

17 Q. So -- 03:38PM

18 A. So don't -- and I still keep fighting for our 03:38PM

19 country. 03:38PM

20 Q. On Page 2, sir, the next section is titled 03:38PM

21 "Despite knowing your claims about Dominion are false, 03:38PM

22 you doubled down on your smear campaign and promoted 03:39PM

23 fabricated evidence to support your accusations." 03:39PM

24 MR. KACHOUROFF: Objection to the extent 03:39PM

25 you're -- 03:39PM

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1 A. They've got some nuts over there.

03:39PM

2 MR. KACHOUROFF: -- argumentative. This is
3 all argument. He never said that.

03:39PM

03:39PM

4 A. You can't -- you can't show me that. Stop
5 saying that. I didn't say anything false. I said
6 nothing false, at all. Despite knowing your claims are
7 false. I would never say a false claim about them if I
8 didn't do my due diligence and I know it's true.

03:39PM

03:39PM

03:39PM

03:39PM

03:39PM

03:39PM

03:39PM

03:39PM

03:39PM

9 Q. (BY MS. WRIGLEY) Now, part of your due
10 diligence was going to look at articles written on the
11 American Report Blog, correct?

12 A. On what?

13 Q. The American Report Blog?

14 A. I don't know American Report Blog.

15 Q. Are you not familiar with the name of that
16 blog, sir?

17 A. I don't know what American Report Blog is.

18 Q. Do you see on the -- in the second paragraph on
19 the first page it says, "Purposely disregarding the
20 paper" --

21 A. That was from Mary Fanning. That was a -- that
22 was a printout from Mary Fanning.

23 Q. That was in your --

24 A. This was on Twitter.

25 Q. -- social media post?

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1 A. I just reTweeted it.

03:39PM

2 Q. Okay.

03:39PM

3 A. I just reTweeted it.

03:39PM

4 Q. And do you recognize that being an article that
5 Mary Fanning wrote?

03:39PM

6 A. No. But it says "The American Report
7 exclusive." And that must have -- I think that was her
8 website. I don't know. But this is my Twitter account.
9 I reTweeted that. It was out there. And I don't know
10 what day that was reTweeted.

03:39PM

03:40PM

03:40PM

03:40PM

03:40PM

11 Q. Well, Dominion specifically --

03:40PM

12 A. January 11th. January 11th. It says, "Mary
13 Fanning and Alex Jones."

03:40PM

03:40PM

14 Q. Okay. Let me ask you a question, sir. On
15 Page 2 in that second paragraph, Dominion specifically
16 identifies this Tweet by you that includes an article by
17 Mary Fanning, correct?

03:40PM

03:40PM

03:40PM

03:40PM

18 A. Say that again.

03:40PM

19 Q. Paragraph 2 --

03:40PM

20 A. Yeah.

03:40PM

21 Q. -- on Page 2 of this Dominion letter to you
22 specifically identifies a Tweet that included an article
23 that you received from Mary Fanning, correct?

03:40PM

03:40PM

03:40PM

24 A. It looks -- yes.

03:40PM

25 Q. And you Tweeted that out, correct, yourself?

03:40PM

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1	A. Uh-huh.	03:40PM
2	Q. And the article is "Exclusive: Proof China,	03:40PM
3	Russia Hacked 2020 Election."	03:40PM
4	A. That's correct.	03:40PM
5	Q. "IP Addresses In China, Russia, Hong Kong,	03:40PM
6	Germany, Canada, Czech Republic Hacked PA, NV, MI, GA	03:40PM
7	Battleground States Raw Data Analytics" -- "Raw Data	03:41PM
8	Analytics Show." Do you see that?	03:41PM
9	A. Uh-huh.	03:41PM
10	Q. That is the proof Mary Fanning gave you --	03:41PM
11	A. No, it's not. Not at all. That's just the	03:41PM
12	thing I reTweeted on January 11th. That's not the proof	03:41PM
13	she gave me.	03:41PM
14	Q. That article is not the proof that she gave	03:41PM
15	you?	03:41PM
16	A. No.	03:41PM
17	Q. Well, if you go to Page 3, do you see that	03:41PM
18	Dominion goes on to discuss and attack the reliability	03:41PM
19	of information presented in that article?	03:41PM
20	A. Good for her. I -- she -- I didn't even	03:41PM
21	know -- that's just an article I reTweeted.	03:41PM
22	Q. You wouldn't have disregarded the information	03:41PM
23	Dominion provided you in this letter?	03:41PM
24	A. What's that?	03:41PM
25	Q. Would you have disregarded the information that	03:41PM

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1 Dominion provided to you in this letter?

03:41PM

2 A. What Dominion -- no matter what Dominion gave
3 me, I already got my evidence when this -- when they
4 sent this on January 9th. Nothing was going to change
5 my mind. I had done my due diligence for two months.

03:41PM

03:41PM

03:41PM

03:41PM

6 I knew that you had to explain all these
7 people that voted. It's impossible to do it with
8 people. You had to use computers. There's no other way
9 around it. It's mathematically impossible.

03:41PM

03:41PM

03:41PM

03:41PM

10 If I stood before you and showed you all 50
11 states and how many -- and every state and county in the
12 United States, everyone had residents that voted that
13 didn't -- and they're -- and people that were deceased,
14 you can't explain it to me. I could because of Hammer
15 Scorecard, because of the machines. You can't explain
16 it any other way.

03:42PM

03:42PM

03:42PM

03:42PM

03:42PM

03:42PM

03:42PM

17 Q. Mr. Lindell, can I direct your attention to
18 Page 4, please. Do you see this on Page 4, Dominion's
19 letter has a section titled "Proven liars. Conspiracy
20 theorists and nonexperts are not reliable sources of
21 information"? Do you see that?

03:42PM

03:42PM

03:42PM

03:42PM

03:42PM

22 A. Where does it say that?

03:42PM

23 Q. Page 4, section 2.

03:42PM

24 A. I'm on 4.

03:42PM

25 Q. Do you see that, sir?

03:42PM

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1 A. Uh-huh.

03:42PM

2 Q. The paragraph states out, "Despite constantly
3 stating that you have done your due diligence and seen
4 the evidence yourself, the only evidence you have ever
5 delivered is the nonsensical and spatially unreliable
6 American Report." Do you see that?

03:42PM

03:42PM

03:42PM

03:42PM

03:42PM

7 A. Uh-huh.

03:42PM

8 Q. And you understand The American Report is a
9 site run by Mary Fanning, correct?

03:42PM

03:42PM

10 A. That's what these guys are putting that I had
11 Tweeted. I had not stuck out information. What I was
12 trying to do -- here's what you're missing here --

03:42PM

03:42PM

03:43PM

13 MR. KACHOUROFF: Well, Mike, let her ask
14 the question.

03:43PM

03:43PM

15 MS. WRIGLEY: Yeah.

03:43PM

16 THE WITNESS: No, because I -- I'm going to
17 answer the question.

03:43PM

03:43PM

18 MR. KACHOUROFF: No. I'm going to ask --
19 you'll get a chance. I'll clean it up.

03:43PM

03:43PM

20 THE WITNESS: She asked me about The
21 American Report.

03:43PM

03:43PM

22 A. That wasn't my image. Dominion was
23 misconstrued. I didn't put the evidence out there
24 because of one reason. Dennis Montgomery had a gag
25 order on him that had to be signed by the President. He

03:43PM

03:43PM

03:43PM

03:43PM

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1 had to get it signed or he could not put it all out 03:43PM
2 there. You guys have the 32 terabytes now. But it's 03:43PM
3 still under a gag order. 03:43PM

4 I could not put that out there. I was 03:43PM
5 under a gag order. You can't put it out there. I know 03:43PM
6 it's real, but I can't put it out there. 03:43PM

7 Mary's little American Report, whatever was 03:43PM
8 on there, I'd have to look back to see what they're 03:43PM
9 talking about. 03:43PM

10 Q. (BY MS. WRIGLEY) Sir, now, going back to the 03:43PM
11 Dominion letter you received on Page 4, do you see that 03:43PM
12 it goes on, starting at the bottom with Russell Ramsland 03:43PM
13 and lists a number of experts that it claims are 03:43PM
14 unreliable? 03:43PM

15 A. Uh-huh. 03:43PM

16 Q. Is that -- is that a "yes," sir? 03:43PM

17 A. What's that now? 03:43PM

18 Q. I'm sorry, what? 03:43PM

19 A. What's that -- what was your question? 03:43PM

20 Q. Going back to the Dominion letter you 03:44PM
21 received -- 03:44PM

22 A. Yeah. 03:44PM

23 Q. -- on Page 4 at the bottom, do you see that it 03:44PM
24 goes on to list a number of people that it claims are 03:44PM
25 unreliable, starting with Russell Ramsland? 03:44PM

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1 A. You know -- you know what I see right above 03:44PM
2 that? Dominion says you're going to -- you plan on 03:44PM
3 putting out this documentary, and it -- and you plan to 03:44PM
4 feature your glorified MyPillow infomercial. I never 03:44PM
5 put a commercial in that thing. So they're already 03:44PM
6 putting lies there. It's like they're -- I don't know 03:44PM
7 what they were doing. 03:44PM

8 Q. Well, let me get back to this list, sir. 03:44PM

9 A. And all these -- Russell Ramsland. So I'm 03:44PM
10 seeing names here. 03:44PM

11 Q. Okay. Russell Ramsland is -- 03:44PM

12 A. Russell Ramsland. 03:44PM

13 Q. -- is number one, right? 03:44PM

14 A. Now, Russell Ramsland -- 03:44PM

15 Q. Let me ask the question, sir. 03:44PM

16 A. Yeah. 03:44PM

17 Q. Okay? 03:44PM

18 A. Okay. 03:44PM

19 Q. The first one listed here is Russell Ramsland, 03:44PM
20 correct? 03:44PM

21 A. They just put Russell Ramsland. 03:44PM

22 Q. Okay. 03:44PM

23 A. But I knew about Russell Ramsland. 03:44PM

24 Q. Okay. And did you understand when you got this 03:44PM
25 letter from Dominion that Dominion was saying these 03:44PM

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1 people were not reliable?

03:44PM

2 A. Right. Dominion lied, because I already knew
3 that about Russell.

03:44PM

03:44PM

4 Q. You did not believe Dominion; is that right?

03:44PM

5 A. Not Russell Ramsland, because you know why? I
6 had done my due diligence on that. He was in charge of
7 the Antrim County, Michigan investigation, and the State
8 of Texas had used him as a -- to say -- to -- as an
9 investigation. This is his world. They're called -- I
10 forget what the name of their company is. They've been
11 in business for 20 years in Texas.

03:44PM

03:45PM

03:45PM

03:45PM

03:45PM

03:45PM

03:45PM

12 Q. ASOG?

03:45PM

13 A. ASOG.

03:45PM

14 They -- they talk -- or they -- in the
15 State of Texas, I think it was Paxton, Attorney General,
16 they showed him, hey, Dominion machines are vulnerable,
17 whatever, and they got rid of Dominion machines because
18 of Ramsland. Ramsland was involved in the investigation
19 into Antrim County, Michigan. I know what they did to
20 that investigation.

03:45PM

03:45PM

03:45PM

03:45PM

03:45PM

03:45PM

03:45PM

21 THE COURT REPORTER: Will you please slow
22 down?

03:45PM

03:45PM

23 Q. (BY MS. WRIGLEY) Yes.

03:45PM

24 A. I knew what they did to that investigation. So
25 right there, I knew, oh, they're discrediting Russell

03:45PM

03:45PM

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1 Ramsland? Wrong. Because I did my own due diligence on 03:45PM
2 him. 03:45PM

3 Q. Now, Mr. -- 03:45PM

4 A. So they were liars. 03:45PM

5 Q. Mr. Russell Ramsland was deposed in this case. 03:45PM
6 Are you aware of that? 03:45PM

7 A. No. 03:45PM

8 Q. Do you know whether he took the Fifth in that 03:45PM
9 deposition? 03:45PM

10 A. I have no idea what Russ Ramsland did. Did he? 03:45PM

11 Q. I'm asking you if you know, sir? 03:45PM

12 A. I have no idea. I knew Flynn did, because I 03:45PM
13 was very upset. He should have told you everything 03:45PM
14 about Hammer Scorecard, about your company. 03:46PM

15 Q. And let me -- I want to jump ahead to another 03:46PM
16 individual listed in this Dominion letter on Page 9. Do 03:46PM
17 you see that Dennis Montgomery is listed here? 03:46PM

18 A. You realize I've never read this, right, ever? 03:46PM

19 Q. But Mr. Lindell, you forwarded it to yourself, 03:46PM
20 correct? 03:46PM

21 A. I forwarded it, but this was on February 5th. 03:46PM
22 If you knew what I did on February 5th, I didn't have 03:46PM
23 time to read this. 03:46PM

24 Q. You disregarded this legal letter from Dominion 03:46PM
25 before you were accused them of -- 03:46PM

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1 A. I probably read part of it. 03:46PM

2 Q. -- rigging the election, sir? 03:46PM

3 A. I -- I never -- I know I never read it because 03:46PM

4 I've never seen Dennis Montgomery's name on here. 03:46PM

5 This -- I probably read the first part. 03:46PM

6 Was this an attachment? Was this an 03:46PM

7 attachment? 03:46PM

8 Q. It was an attachment to the E-mail. 03:46PM

9 A. I never read the attachment. I probably read 03:46PM

10 the opening thing. 03:46PM

11 Q. Let me ask you this: You disregarded this 03:46PM

12 letter from Dominion's lawyers before you put "Absolute 03:46PM

13 Proof" out? 03:46PM

14 A. Absolutely, because this was read -- this was 03:46PM

15 forwarded to me when? This came to me on February 5th. 03:46PM

16 "Absolute Proof" was already out. 03:46PM

17 Q. And -- 03:46PM

18 A. And what? 03:46PM

19 Q. -- even though you knew you were about to 03:46PM

20 accuse, in "Absolute Proof," Dominion of rigging the 03:47PM

21 2020 election? 03:47PM

22 MR. KACHOUROFF: Objection. That's 03:47PM

23 argumentative. 03:47PM

24 A. Even though I knew what? 03:47PM

25 MR. KACHOUROFF: He indicated the machines 03:47PM

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1 did it, were used to rig the election.

03:47PM

2 A. Even though I knew what?

03:47PM

3 Q. (BY MS. WRIGLEY) Even though you knew that you
4 were about to accuse Dominion of rigging the 2020
5 election in "Absolute Proof"?

03:47PM

03:47PM

03:47PM

6 A. If I'd have seen this before then, I would have
7 put it out. I knew what I knew on it. It's a hundred
8 percent.

03:47PM

03:47PM

03:47PM

9 Q. So let's look --

03:47PM

10 A. They did it.

03:47PM

11 Q. Let's look at Page 9, sir.

03:47PM

12 A. Huh?

03:47PM

13 Q. Stay with me on Page 9 in the section on --
14 (Crosstalk.)

03:47PM

03:47PM

15 A. I mean, this is a hundred percent.

03:47PM

16 Q. (BY MS. WRIGLEY) Okay. Do you see number
17 seven is Dennis Montgomery?

03:47PM

03:47PM

18 A. Yeah.

03:47PM

19 Q. And let's try to slow down because she's
20 getting frustrated with the two of us.

03:47PM

03:47PM

21 A. Uh-huh.

03:47PM

22 Q. Dominion writes about Mr. Montgomery on Page 9.
23 Do you see that?

03:47PM

03:47PM

24 A. Yep.

03:47PM

25 Q. Dominion says, "Dennis Montgomery is a

03:47PM

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1 fraudster known for pulling off one of the most 03:47PM
2 elaborate and dangerous hoaxes in American history after 03:47PM
3 he tricked the federal government into paying millions 03:47PM
4 of dollars for bogus terrorist detection software." Do 03:47PM
5 you see that? Do you know whether that's true or not? 03:47PM

6 A. It's not true. 03:47PM

7 Q. How do you know? 03:47PM

8 A. Because I know. I've done the due diligence. 03:48PM
9 I've talked to the people in the government, the people 03:48PM
10 that paid him. His paychecks. What do you mean? 03:48PM

11 Q. Who did you talk to in the government, sir? 03:48PM

12 A. General Flynn McInerney, Colonel Waldron. The 03:48PM
13 people -- the people -- and you can validate. Sean 03:48PM
14 Hannity did a big investigation -- 03:48PM

15 Q. Sean Hannity is going to vouch for Dennis 03:48PM
16 Montgomery, sir? 03:48PM

17 A. He won't any more because he's afraid of all 03:48PM
18 you guys. He won't any more, but he sure did on his 03:48PM
19 show in 2017. Dennis Montgomery was the biggest 03:48PM
20 thing -- discovery ever. 03:48PM

21 Q. So you're relying upon Sean Hannity -- 03:48PM

22 A. And it's -- and I will tell you this -- 03:48PM

23 Q. -- for -- 03:48PM

24 A. -- when it says here about -- I'm sorry. 03:48PM

25 Q. You're relying upon information --

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1 MR. KACHOUROFF: Objection.

2 Q. (BY MS. WRIGLEY) -- from Sean Hannity in
3 assessing the credibility of Dennis Montgomery?

4 MR. KACHOUROFF: Objection.

5 A. No.

03:48PM

6 MR. KACHOUROFF: That's not his testimony.

03:48PM

7 A. Absolutely not. That was -- I think it was
8 public. They did an investigation into you. I've seen
9 that. I've seen that investigation.

03:48PM

03:48PM

03:48PM

10 I did my own thing. I lived and breathed
11 Dennis Montgomery for three years, hundred percent,
12 hundred percent.

03:48PM

03:48PM

03:48PM

13 Q. (BY MS. WRIGLEY) And just so we're clear, in
14 terms of doing your own thing in assessing the
15 credibility of Dennis Montgomery, that includes speaking
16 with General Flynn, Colonel Waldron, General McInerney
17 and doing Internet research, correct, sir?

03:48PM

03:48PM

03:49PM

03:49PM

03:49PM

18 A. No. And say -- and having Dennis himself give
19 me all his credentials. I bought into his company,
20 Bixware. I owned part of Bixware or all of it. I
21 bought into his company. We went all the way back, when
22 the company was formed, what the government paid him,
23 all the E-mails going back and forth with the
24 government. He worked there for like 15, 20 years for
25 the CIA. I got his whole war chest in front of me.

03:49PM

03:49PM

03:49PM

03:49PM

03:49PM

03:49PM

03:49PM

03:49PM

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1 Q. So --

03:49PM

2 A. So, no, I did that. And I will tell you this,
3 in 2009, he was charged with obtaining money under false
4 pretenses and to pay Caesars Palace --

03:49PM

03:49PM

03:49PM

5 THE COURT REPORTER: Will you please slow
6 down?

03:49PM

03:49PM

7 A. -- to pay Caesars Palace for bad checks.

03:49PM

8 I was an ex-crack addict. Does that make
9 what I say not truthful?

03:49PM

03:49PM

10 I mean, is -- you know,
11 Dennis Montgomery --

03:49PM

03:49PM

12 Q. (BY MS. WRIGLEY) Mr. Lindell --

03:49PM

13 A. -- if any of this is true about his Caesars
14 Palace, it has nothing to do -- evidence is evidence.
15 You -- it doesn't matter who brings you the evidence.

03:49PM

03:49PM

03:49PM

16 If I say this is a coffee cup and you
17 brought it to me, that's a coffee cup. I don't care
18 what your past is. Is this a coffee cup or not?

03:49PM

03:50PM

03:50PM

19 Dennis Montgomery has -- was a hundred
20 percent evidence. Hammer Scorecard is real. He had a
21 contract with the government. They --

03:50PM

22 THE COURT REPORTER: Can you please slow
23 down?

24 Q. (BY MS. WRIGLEY) Yes, Mr. Lindell --

25 A. -- and they paid him millions of dollars.

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1 MR. KACHOUROFF: Slow down. Okay?

2 Q. (BY MS. WRIGLEY) -- please, please slow down.

3 A. They paid him millions of dollars. 03:50PM

4 MR. KACHOUROFF: You're asking him -- just 03:50PM

5 objection here. You've sandbagged him with this letter. 03:50PM

6 MS. WRIGLEY: I do -- let's -- let's be 03:50PM

7 clear. I'm trying to ask him some questions, but he's 03:50PM

8 testifying -- 03:50PM

9 MR. KACHOUROFF: I realize that -- I -- 03:50PM

10 MS. WRIGLEY: -- unpromptedly -- 03:50PM

11 MR. KACHOUROFF: Well, I realize that he -- 03:50PM

12 MS. WRIGLEY: -- whatever he wants. 03:50PM

13 MR. KACHOUROFF: But you -- you pull out a 03:50PM

14 letter he doesn't -- 03:50PM

15 MS. WRIGLEY: A letter he received, sir. 03:50PM

16 MR. KACHOUROFF: Okay. What I'm going to 03:50PM

17 do is instruct my client now to read the entire 03:50PM

18 letter -- 03:50PM

19 MS. WRIGLEY: That's fine. 03:50PM

20 MR. KACHOUROFF: -- from Page 1 to Page 9. 03:50PM

21 MS. WRIGLEY: Let's go off the record and 03:50PM

22 take a break. 03:50PM

23 MR. KACHOUROFF: No. We're staying on the 03:50PM

24 record for this. It's your exhibit. 03:50PM

25 MS. WRIGLEY: He can do that. We can stop 03:50PM

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1 the record and he can come back and review it when we 03:50PM
2 come back on. 03:50PM

3 MR. KACHOUROFF: If you want to take break, 03:50PM
4 we'll take a break. 03:50PM

5 MS. WRIGLEY: Yeah. I don't even think 03:50PM
6 there's a question pending at this point. He's just 03:50PM
7 been talking at length unpromptedly about whatever he 03:50PM
8 feels like. 03:50PM

9 MR. KACHOUROFF: And I -- just so you know, 03:50PM
10 it's going both ways. That's the way I look at it. 03:50PM

11 MS. WRIGLEY: I've been trying to ask him 03:51PM
12 some questions, but he's -- 03:51PM

13 MR. KACHOUROFF: Okay. 03:51PM

14 MS. WRIGLEY: -- answering whatever 03:51PM
15 question he feels like answering. 03:51PM

16 MR. KACHOUROFF: All right. We're off the 03:51PM
17 record, right? 03:51PM

18 THE VIDEOGRAPHER: We're going off the 03:51PM
19 record at 3:50. 03:51PM

20 (Short recess.) 04:04PM

21 THE VIDEOGRAPHER: Okay. We're back on the 04:04PM
22 record at 4:04. 04:04PM

23 THE WITNESS: On the question she was 04:04PM
24 asking -- 04:04PM

25 MR. KACHOUROFF: Don't worry about it. 04:04PM

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1 Don't worry about it.

04:04PM

2 THE WITNESS: I'm just telling you.

04:04PM

3 MR. KACHOUROFF: Okay.

04:04PM

4 THE WITNESS: It was the time -- the date,
5 okay --

04:04PM

04:04PM

6 MR. KACHOUROFF: Yeah, don't worry about
7 it. Don't worry about it.

04:04PM

04:04PM

8 Q. (BY MS. WRIGLEY) Okay. Mr. Lindell, I'm done
9 with 630 for -- for now. That was the letter from
10 Dominion.

04:04PM

04:04PM

04:04PM

11 A. Okay.

04:04PM

12 Q. Okay. Why don't we move on, and I'll show you
13 another exhibit, 631.

04:04PM

04:05PM

14 (Exhibit 631 marked.)

04:05PM

15 Q. (BY MS. WRIGLEY) Mr. Lindell, looking at 631,
16 do you see this an E-mail chain from -- and it's got a
17 number of E-mails in it, but it has a chain that ends on
18 January 1st, 2021.

04:05PM

04:05PM

04:05PM

04:05PM

19 And for the record, it's DEF 019282, and it
20 has four pages.

04:05PM

04:05PM

21 Do you see at the top on the first page,
22 sir?

04:05PM

04:05PM

23 A. What's that? Who's what?

04:05PM

24 Q. In the -- at the very top --

04:05PM

25 A. Scott. Scott Hennen.

04:05PM

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1 Q. Yes. Do you see this is an E-mail chain that 04:05PM
2 ends on January 1st, 2021? 04:05PM

3 A. Uh-huh. 04:05PM

4 Q. And at the very top on the first page, do you 04:05PM
5 see it's an E-mail forwarded to you from Scott Hennen 04:05PM
6 with the subject "Forward. Wake up Kevin Cramer"? Do 04:06PM
7 you see that? 04:06PM

8 A. Yes. 04:06PM

9 Q. Now, who is Scott Hennen? 04:06PM

10 A. Scott Hennen runs a radio program in North 04:06PM
11 Dakota, and he's friends with Senator Cramer. 04:06PM

12 Q. Okay. And who is Kevin Cramer, sir? 04:06PM

13 A. He's a senator. 04:06PM

14 Q. What state is Kevin Cramer a senator in? 04:06PM

15 A. North Dakota. 04:06PM

16 Q. Kevin Cramer is the senator of North Dakota? 04:06PM

17 A. (Witness indicated by nodding his head 04:06PM
18 affirmatively.) 04:06PM

19 Q. Okay. And Mr. Hennen forwarded you an E-mail 04:06PM
20 stating, "For your eyes only. Please keep this 04:06PM
21 confidential, but it will help you understand Kevin's 04:06PM
22 thinking as we pray for him and attempt to get him where 04:06PM
23 you, Kendra and I are." Do you see that? 04:06PM

24 A. Uh-huh. 04:06PM

25 Q. And he forwarded an E-mail to you that he 04:06PM

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1 received from Kevin Cramer, correct?

04:06PM

2 A. I guess. I've never -- I have never read this.

04:06PM

3 Q. It was sent to your MyPillow.com E-mail

04:06PM

4 address. Do you see that?

04:06PM

5 A. Yes.

04:06PM

6 Q. And you don't remember --

04:06PM

7 A. Do you guys -- do you realize how many -- let

04:07PM

8 me tell you how many E-mails I read out of a thousand

04:07PM

9 E-mails a week, maybe two --

04:07PM

10 Q. Well --

04:07PM

11 A. -- just so you know that.

04:07PM

12 Q. -- let's -- let me walk -- let me walk through

04:07PM

13 this.

04:07PM

14 A. And the reason I know I never read this, I

04:07PM

15 wouldn't even read all this. I mean, this is a long

04:07PM

16 E-mail. I wouldn't have took the time to read it. I

04:07PM

17 would have called Kevin up or I would have called Scott

04:07PM

18 up and say what's the gist of this? That's what I would

04:07PM

19 do. I get people on the phone. I'm not going to

04:07PM

20 read -- sit here and read all this nonsense. Blah,

04:07PM

21 blah, blah, blah, blah.

04:07PM

22 Q. Well, let's look at what the E-mail did

04:07PM

23 contain. Look at Page 1. Do you see that the -- Kevin

04:07PM

24 Cramer wrote an E-mail to Scott Hennen in the chain on

04:07PM

25 January 1st, 2021? Do you see that, sir?

04:07PM

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1 A. "I appreciate my lawyers are doing everything
2 else, looking into every accusation and response."

3 Q. Do you see that, sir?

4 A. Uh-huh.

5 Q. Okay. The second paragraph says, "Remember,
6 Georgia has two GOP U.S. senators, a Republican governor
7 and secretary of state. Pennsylvania has one of the
8 most conservative senators in America, who nominated one
9 of the most conservative federal judges in America" --

10 A. Uh-huh.

11 Q. -- "and an appellate judge appointed by G" --
12 "DJP. They aren't" --

13 A. Right.

14 Q. -- "lightweights in any legal fight, and they
15 not only reject the Trump allegations, but have blown
16 them out of the water in PA. Wisconsin has one of the
17 toughest, most conservative pro-Trump senators who has
18 held hearings on this stuff, and not even he is
19 convinced. Like me, he believes there were a lot of
20 abuses of the mail-in ballot situation allowed by many
21 states, but is still waiting for real evidence." Do you
22 see that?

23 A. Uh-huh.

24 Q. He continues, "But we still dig in and remain
25 open. But my default is not to vote to disenfranchise

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1 voters from other states unless I can see evidence it
2 has a chance of leading to proof. I may object to a
3 state or two, although I find it difficult to justify
4 voting to disenchant" -- "franchise voters from a state
5 with Republican senators who vouch for their states."

6 Do you see that, sir?

7 A. Uh-huh.

8 Q. He continues, "With regards to self-righteous
9 voters who think I'm their robot, you're welcome.

10 Probably not 1 percent of them supported Trump before I
11 did. None of them spent an ounce of political capital
12 on Trump's behalf. I spent it all. I'm certain none of
13 them have raised over 250,000 for the president's
14 defense team to piss down a rabbit -- a rat hole
15 pretending to be lawyers disguised as television
16 personalities. I am evidence no deed goes unpunished by
17 the mob, who believes they rule just because they live
18 in the freest place on earth." Do you see that?

19 A. Uh-huh.

20 Q. Mr. Cramer continues -- or Senator Cramer
21 continues.

22 A. Uh-huh.

23 Q. "As you can tell, I'm not just frustrated, I am
24 pissed off. Perhaps the most disappointing thing about
25 it is so many otherwise good people think America cannot

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1 survive without Donald Trump. If he loaded the ballot
2 boxes in California with Republican mail-in votes by
3 dead people and won, none of them would be concerned,
4 and I would be" -- "would be yelling at me to defend
5 Trump. I love the guy, but not as much as I love
6 America." Do you see that?

7 A. Uh-huh.

8 Q. And he continues. "The irony is the easiest
9 thing for me to do politically would be to object to
10 every elector in swing states and vote to not count the
11 ballots. It would be hard for me to defend the
12 electoral college afterwards, but I suppose if that's
13 what conservatives want, we can do that. So far, I have
14 not had to vote on a declaration of war, but this is
15 nearly as hard. It is not a game to be played lightly,
16 yet that's what modern communication has made it.
17 Politics has become an easy spectator sport for people
18 to tune in on their cable channel of choice, but it is
19 the new world we live and serve in." Do you see that?

20 A. Uh-huh.

21 Q. He says, "As for me, I will not be deterred
22 from seeking truth and voting my conscience and always
23 being willing to explain it even to ungrateful listeners
24 and constituents." Do you see that?

25 A. Uh-huh.

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1 Q. And it -- he continues on to the next page. 04:10PM

2 A. Uh-huh. 04:10PM

3 Q. Do you see that? 04:10PM

4 A. Uh-huh. 04:10PM

5 Q. Now, were you aware of these sentiments by 04:10PM

6 Mr. Cramer on January 1st, 2021, sir? 04:10PM

7 A. When Scott -- I do remember this now, because 04:10PM

8 Scott made me aware of this. Now, did I read all this? 04:10PM

9 No. But I did read -- 04:10PM

10 MR. KACHOUROFF: Mike, let -- you've 04:10PM

11 answered the question, yes, I was aware of it. Now let 04:10PM

12 her ask you another one. 04:10PM

13 Q. (BY MS. WRIGLEY) And in the E-mail chain 04:11PM

14 before this one from Mr. Cramer, do you see that 04:11PM

15 Mr. Hennen on the second page -- are you -- are you with 04:11PM

16 me? 04:11PM

17 A. Yeah. 04:11PM

18 Q. He had written to Mr. Cramer on -- in a couple 04:11PM

19 of lines down, do you see that he said, "Can you just 04:11PM

20 proceed with your Cramer/Lindell/Johnson idea to do a 04:11PM

21 fair, expedited, lawyerlike review of 10 percent of the 04:11PM

22 best arguments"? 04:11PM

23 A. Where -- where are you looking here? What 04:11PM

24 page? 04:11PM

25 Q. Page 2, four paragraphs down in the Scott 04:11PM

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1 Hennen E-mail to Senator Cramer.

04:11PM

2 A. "Can you proceed" --

04:11PM

3 Q. Yes --

04:11PM

4 A. -- "with your Cramer/Lindell/Johnson idea to do
5 a fair, expedited, lawyerlike review of 10 percent of
6 the best" --

04:11PM

04:11PM

04:11PM

7 THE COURT REPORTER: I'm sorry.

04:11PM

8 A. Is that the one?

04:11PM

9 Q. (BY MS. WRIGLEY) Yes.

04:11PM

10 A. Okay.

04:11PM

11 Q. He says, "Can you proceed with your
12 Cramer/Lindell/Johnson idea to do a fair, expedited,
13 lawyerlike review" --

04:11PM

04:11PM

04:11PM

14 A. Uh-huh.

04:11PM

15 Q. -- "of 10 percent of the best arguments on the
16 evidence."

04:11PM

04:11PM

17 A. Uh-huh.

04:11PM

18 Q. "Start with the Trump Hotel meeting and give
19 Sidney Powell/General Flynn, et cetera, a fair hearing,
20 see some actual proof, et cetera, and hold them
21 accountable to any crackpot crack they have peddled."

04:11PM

04:11PM

04:11PM

04:11PM

22 A. Uh-huh.

04:11PM

23 Q. Do you see that?

04:12PM

24 A. Yep.

04:12PM

25 Q. And he sort of continues down, trying to

04:12PM

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1	convince Senator Cramer to look into election fraud,	04:12PM
2	correct?	04:12PM
3	A. That's correct.	04:12PM
4	Q. And Mr. Cramer, in response, basically sort of	04:12PM
5	rejected Mr. --	04:12PM
6	A. No, he looked into it. We had that meeting.	04:12PM
7	Q. You did have the meeting?	04:12PM
8	A. Uh-huh.	04:12PM
9	Q. When was the meeting, sir?	04:12PM
10	A. It was in Trump Hotel.	04:12PM
11	Q. The meeting --	04:12PM
12	A. The meeting --	04:12PM
13	Q. Did it start with the Trump Hotel?	04:12PM
14	A. -- they're talking about was in Trump Hotel,	04:12PM
15	and we were -- I didn't have a lot to present,	04:12PM
16	obviously, because I didn't have my evidence because it	04:12PM
17	wasn't January 9th. Okay?	04:12PM
18	But there was Ron Johnson from -- Ron	04:12PM
19	Johnson was on by Skype. I remember Cramer was there.	04:12PM
20	There was two other senators there. And all this stuff	04:12PM
21	was presented, that I hadn't seen before, to them.	04:12PM
22	Q. Was it presented by General Flynn and Sidney	04:12PM
23	Powell?	04:12PM
24	A. I don't know if Flynn was there. Sidney	04:12PM
25	Powell's, her whole team, there was like a ton of them	04:13PM

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1	there.	04:13PM
2	Q. And this was prior to January 1st, 2021?	04:13PM
3	A. Prior to what?	04:13PM
4	Q. January 1st, 2021?	04:13PM
5	A. Oh, it was after January 1st.	04:13PM
6	Q. Well, Mr. Hennen refers to that -- that Trump	04:13PM
7	Hotel meeting in January --	04:13PM
8	A. Oh, he does?	04:13PM
9	Q. -- 2021.	04:13PM
10	A. Where?	04:13PM
11	Q. The fourth paragraph. "Start with the Trump	04:13PM
12	Hotel meeting," indicating the meeting already took	04:13PM
13	place?	04:13PM
14	MR. KACHOUROFF: I don't read it -- I don't	04:13PM
15	read it that way, but --	04:13PM
16	A. Where do you see the Trump Hotel meeting?	04:13PM
17	Q. (BY MS. WRIGLEY) Where it says, "Start with	04:13PM
18	the Trump Hotel meeting and give Sidney Powell/General	04:13PM
19	Flynn, et cetera, a fair hearing." Do you see that?	04:13PM
20	MR. KACHOUROFF: That doesn't say that.	04:13PM
21	A. Where do you -- where --	04:13PM
22	Q. (BY MS. WRIGLEY) Are you in that paragraph?	04:13PM
23	I'll just get us there, and then I'll ask the question.	04:13PM
24	Are you with me, Mr. Lindell? It's the	04:13PM
25	second page.	04:13PM

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1 A. I'm on the second page.

04:13PM

2 Q. 1, 2, 3, 4, 5 --

04:13PM

3 A. "Start with the Trump" --

04:13PM

4 Q. Yes.

04:13PM

5 A. -- "Hotel meeting." Because at the time, they
6 had planned that meeting. Okay?

04:13PM

04:13PM

7 Q. And it had not -- had it taken place yet?

04:13PM

8 A. It had not happened yet. It happened on
9 January 4th or 5th.

04:13PM

04:14PM

10 Q. Okay. And that was before --

04:14PM

11 A. I got my evidence on the 9th.

04:14PM

12 Q. And the evidence was from Brannon Howse and
13 Mary Fanning, correct?

04:14PM

04:14PM

14 A. No. The evidence was from Dennis Montgomery,
15 but she told me about Dennis Montgomery.

04:14PM

04:14PM

16 Q. Okay.

04:14PM

17 A. The evidence I seen at that meeting was all --
18 this was even an add-on. This was like, wow. This was
19 stuff that Sidney's group had.

04:14PM

04:14PM

20 Q. And let me ask you about Sidney Powell. In --
21 at the end of 2020, did you give any moneys to Sidney
22 Powell to investigate election fraud claims?

04:14PM

04:14PM

04:14PM

23 A. At the end of 2020?

04:14PM

24 Q. Yes.

04:14PM

25 A. No. I gave 50 -- I gave 50,000, and that money

04:14PM

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1 went to ASOF [sic] that -- whatever that guy's name
2 is -- Russell Ramsland in Texas.

3 Q. And then in 2021, did you give any money to
4 Sidney Powell to investigate election fraud?

5 A. No.

6 Q. How about General Flynn? Have you ever
7 paid General Flynn for any work on election fraud?

8 A. General Flynn, at the end of December of 2020,
9 I gave money to whatever he -- whatever they were doing.

10 Q. How much money did you give General Flynn?

11 A. I don't remember. 20 grand, 50 grand, whatever
12 it was.

13 Q. Okay. Now --

14 A. I think it was early January.

15 Q. -- Senator Cramer did participate in this
16 meeting at the Trump Hotel?

17 A. Uh-huh.

18 Q. And was the purpose of that meeting to talk
19 about election fraud claims?

20 A. It was to show, yeah, election -- election
21 fraud, correct.

22 Q. And who was in charge of that meeting, sir?

23 A. I don't know. I -- I think -- I think Sidney,
24 I want to say, it could have been. You know, I might
25 have been -- I might have set it up. You know, I don't

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1 know.

04:15PM

2 Q. And, Mr. Lindell, why did you set it up?

04:15PM

3 A. Because I wanted to see more -- I wanted to
4 see -- I -- my evidence was this. What I kept telling
5 Kevin was, Kevin, you can't explain all these people
6 that voted. Because I had the voter rolls. I -- in
7 North Dakota, you had 4,000 people that voted that
8 didn't live in North Dakota, and nobody would give me
9 answers.

04:15PM

04:15PM

04:15PM

04:15PM

04:15PM

04:15PM

04:15PM

10 And it was like -- and by this time -- by
11 the time I got to this meeting, though, I will tell you
12 this, i had prayed that they would steal both those
13 senators, and they did.

04:15PM

04:15PM

04:15PM

04:16PM

14 And the reason I say that, if I look back
15 now, if Donald Trump would have been put in, we would
16 have lost our country forever. It's such a divine thing
17 that nothing happened back then, because now, three
18 years later, everything we had back then, it gets
19 validated why you have all these people that voted that
20 didn't live in these states.

04:16PM

04:16PM

04:16PM

04:16PM

04:16PM

04:16PM

04:16PM

21 Q. Now, if you look at the sentiment expressed by
22 Mr. Cramer in Exhibit 631, do you know if he changed his
23 mind after this?

04:16PM

04:16PM

04:16PM

24 A. What's that?

04:16PM

25 Q. Did -- do you know if Senator Cramer changed

04:16PM

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1 his mind from what he expressed in Exhibit 631 after
2 this?

3 A. I have no idea. I have no idea.

4 Q. Has Senator Cramer ever publicly said that he
5 believed the election was rigged, the 2020 election?

6 A. I don't know.

7 Q. Has Senator Cramer ever told you that he
8 believes that voting machines had rigged the 2020
9 election?

10 A. I don't know. I can't remember back then. I
11 know he was very open to listening to -- he could not
12 explain when I put before him all these people that
13 voted. Oh, my god, tens of thousands. He couldn't
14 explain that.

15 And -- and when I said that it had to be
16 done with computers, he -- I think he agreed on that.
17 But you've got to -- he said, well, where's the
18 evidence? And then when I had it after January 9th,
19 viola, we've got the evidence.

20 Q. I'm going to hand to you Exhibit 632.

21 (Exhibit 632 marked.)

22 Q. (BY MS. WRIGLEY) It's marked as DEF 029858.
23 And look -- and it's two pages.

24 Looking at the top, do you see this is
25 another forwarded E-mail from Scott Hennen to yourself,

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1 and it's dated January 2nd, 2021?

04:17PM

2 A. Okay.

04:17PM

3 Q. And this was to your E-mail address, correct,
4 at MyPillow.com?

04:17PM

04:17PM

5 A. Yep.

04:17PM

6 Q. And Mr. Hennen wrote to you, "We need Sen Pat
7 Toomey at your Monday gathering of friends with Cramer.
8 See statement." Do you see that?

04:17PM

04:17PM

9 A. Yes.

04:17PM

10 Q. And is that -- the Monday gathering, is that
11 the Trump Hotel meeting?

04:17PM

04:17PM

12 A. Uh-huh.

04:18PM

13 Q. And he forwarded a message from Cramer that was
14 a forward from -- with a Toomey statement. Do you see
15 that?

04:18PM

04:18PM

04:18PM

16 A. (Witness peruses document.)

04:18PM

17 Yeah.

04:18PM

18 Q. And the E-mail below that forward from
19 Mr. Cramer to Scott Hennen was from a Robert --

04:18PM

04:18PM

20 A. Uh-huh.

04:18PM

21 Q. -- Duncan to Rep Secretary Senators. It's a
22 list serve. Do you see that?

04:18PM

04:18PM

23 A. Uh-huh.

04:18PM

24 Q. And do you know who Robert Duncan is?

04:18PM

25 A. No.

04:18PM

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1 Q. Do you see it looks like it's a secretary of
2 senate gov list serve group E-mail address?

3 A. Senator of what -- I don't know what, a senator
4 of something.

5 Q. And it says in that E-mail from Robert Duncan,
6 "Senator Toomey asked that I forward you all his
7 statement below. Thanks." Do you see that?

8 A. Uh-huh.

9 Q. Do you know who Senator Toomey is?

10 A. No.

11 Q. Do you see it says, "Toomey statement"? Do you
12 see that, sir?

13 A. Yep.

14 Q. And it says, "A fundamental defining future of
15 a Democratic Republic is the right of the people to
16 elect their own leaders. The efforts by Senators
17 Hawley, Cruz and others to overturn the results of the
18 2020 presidential election in swing states like
19 Pennsylvania directly undermines those rights. The
20 senators justify their intent by asserting that there
21 have been many allegations of fraud. But allegations of
22 fraud by a losing campaign cannot justify overturning an
23 election. They failed to acknowledge that these
24 allegations have been adjudicated in courtrooms across
25 America and were found to be unsupported by the

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1 evidence. President Trump's own Attorney General, Bill
2 Barr, stated 'We have not seen fraud on a scale that
3 could have effected a different outcome in the
4 election.' I acknowledge that this past election, like
5 all elections, had irregularities, but the evidence is
6 overwhelming that Joe Biden won this election. His
7 narrow victory in Pennsylvania is easily explained by
8 the decline in suburban support for President Trump and
9 the President's slightly smaller victory margins in most
10 rural counties."

11 A. Uh-huh.

12 Q. "I voted for President Trump and endorsed him
13 for reelection, but on Wednesday, I intend to vigorously
14 defend our form of government by opposing this effort to
15 disenfranchise millions of voters in my state and
16 others."

17 A. Uh-huh.

18 Q. Do you see that?

19 Were you aware of this statement from
20 Senator Toomey?

21 MR. KACHOUROFF: I'm going to object on the
22 grounds that this statement is hearsay and completely
23 irrelevant.

24 A. Yeah. If you want me to comment on it, there's
25 been nothing we can do --

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1 MR. KACHOUROFF: She asked -- she asked you 04:20PM
2 if you're aware of it. 04:20PM

3 A. Am I aware of it? You just read it to me. I 04:20PM
4 am now. 04:20PM

5 Q. (BY MS. WRIGLEY) Do you recall receiving this 04:20PM
6 in an E-mail that -- 04:20PM

7 A. I -- I -- 04:20PM

8 Q. -- Mr. Hennen forwarded to you? 04:20PM

9 A. -- I guarantee I didn't read it. Probably 04:20PM
10 didn't read it. 04:20PM

11 Q. Are you aware of statements in January '21 by 04:20PM
12 senators that there was nothing -- no allegations of 04:20PM
13 fraud to justify -- 04:20PM

14 MR. KACHOUROFF: Same objection. 04:20PM

15 A. That's all subjective. 04:20PM

16 Q. (BY MS. WRIGLEY) -- overturning the election? 04:20PM

17 A. He didn't have what I had. 04:21PM

18 Q. During the Trump Hotel meeting in January 2020 04:21PM
19 [sic], was there discussion about senators not voting to 04:21PM
20 certify the election for Biden? 04:21PM

21 A. No. All it was -- the only thing I know I 04:21PM
22 brought up, I -- somebody explained to me how every 04:21PM
23 state -- I listed them off. Nevada, 6,000 people voted 04:21PM
24 that didn't live there. Wisconsin, 11,000 people voted 04:21PM
25 that didn't live there. You pick any state, I had them 04:21PM

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1 laid out. It was unbelievable.

04:21PM

2 Nobody could -- everyone stood back and
3 went, what? And then Powell and them did their thing
4 saying it was done with computers.

04:21PM

04:21PM

04:21PM

5 Q. I'm going to hand you another document, sir.

04:21PM

6 Before I do that, let me ask you this:

04:21PM

7 Prior to February 5th, 2020 and the release of "Absolute
8 Proof," did you ever go to the website of CISA, the
9 Cybersecurity & Infrastructure Security Agency?

04:21PM

04:22PM

04:22PM

10 A. Actually, I think we did, but I don't know
11 which -- what -- if it was before or after.

04:22PM

04:22PM

12 Q. I'm going to hand you Exhibit 633, sir.

04:22PM

13 (Exhibit 633 marked.)

04:22PM

14 Q. (BY MS. WRIGLEY) I'll represent this was
15 marked as Exhibit 115 to the complaint, and it's a
16 printout from the CISA.gov website, the rumor control
17 section.

04:22PM

04:22PM

04:22PM

04:22PM

18 Take a look at this document and tell me if
19 you've ever seen this Rumor Vs. Reality section of
20 CISA's website?

04:22PM

04:22PM

04:22PM

21 A. Uh-huh. This is pretty funny, this part.

04:22PM

22 THE COURT REPORTER: I'm sorry.

04:22PM

23 A. Yeah. I said, that's pretty funny, here on
24 CISA's own site, "Robust safeguards, including
25 canvassing procedures to help ensure the accuracy of

04:22PM

04:22PM

04:23PM

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1	election" -- "official election results. We have	04:23PM
2	canvassed over 50 states and over a million voters	04:23PM
3	and" --	04:23PM
4	MR. KACHOUROFF: Mike, let her ask a	04:23PM
5	question.	04:23PM
6	THE WITNESS: No. I'm --	04:23PM
7	(Crosstalk.)	04:23PM
8	MR. KACHOUROFF: There's no question	04:23PM
9	pending.	04:23PM
10	MS. WRIGLEY: I'm going to move to strike	04:23PM
11	as nonresponsive.	04:23PM
12	Q. (BY MS. WRIGLEY) Have -- are you aware that	04:23PM
13	CISA published research on its website to address rumors	04:23PM
14	versus reality in connection with the 2020 election?	04:23PM
15	A. No.	04:23PM
16	MR. KACHOUROFF: Objection, again, hearsay.	04:23PM
17	This is not -- this is completely irrelevant to the	04:23PM
18	entire case.	04:23PM
19	Q. (BY MS. WRIGLEY) Did you check information on	04:23PM
20	CISA's website prior to --	04:23PM
21	A. No.	04:23PM
22	Q. -- releasing --	04:23PM
23	A. No.	04:23PM
24	Q. -- "Absolute Proof" on February 5th, 2021?	04:23PM
25	A. I don't know, but I was -- what I looking	04:23PM

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1 for was -- I think the Raffensperger case, that Curling
2 case after that. I know Antrim County, Michigan got
3 brought up, and I might have looked at that because I
4 think they -- but I don't know.

5 Q. In connection with validating information that
6 you were given on January 9th from Mary Fanning and
7 Brannon Howse, did you think you should look up
8 information on CISA's website?

9 A. No. I thought I should go right to the
10 government and to the CIA and people that were there.

11 Q. All right. And so you didn't consider
12 information --

13 A. I didn't even know what CISA was, to be honest
14 with you.

15 Q. Did you go to any federal government agency's
16 website to get information about the 2020 election --

17 A. Hundred percent. Dennis Montgomery sent me --

18 THE COURT REPORTER: I can only take one at
19 a time.

20 A. A hundred percent. Dennis Montgomery guided me
21 through all that.

22 Q. (BY MS. WRIGLEY) What websites did you go to,
23 sir?

24 A. I don't know. He brought me to all of the
25 websites, CIA, all the stuff back then.

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1 Q. Do you remember what website Dennis Montgomery
2 guided you to prior to February 5th, 2021, sir?

3 A. No.

4 Q. Not a single one, as you sit here?

5 A. No. They were all government websites to prove
6 he -- that he was real, to prove that he was -- that he
7 had a job there. I was buying into his company, too. I
8 bought into his company.

9 Q. And what information did he show you with
10 respect to the 2020 election when he sent you to these
11 websites, sir?

12 A. All of the massive data, which I had a guy
13 verify, and flips of the election. You've just seen a
14 smidgen of it in that movie. You guys have a copy of 32
15 terabytes of data.

16 Q. And he -- he showed you that information by
17 going to a publicly available website?

18 A. No. By his website.

19 Q. Whose own website?

20 A. It was his -- his Hammer, his -- his computer.

21 Q. His computer, Hammer -- the Hammer and
22 Scorecard?

23 A. No. That's -- the Hammer and Scorecard is
24 owned by the government. Yeah, the government has that.

25 Q. Did he hack into a government system and then

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1 let you have access to that?

04:25PM

2 A. No. He's got -- he's got the technology. He
3 owns the technology. The government paid him for his
4 technology.

04:25PM

5 Q. Did you pay Dennis Montgomery for any work that
6 he did in connection with your "Absolute Proof,"
7 "Absolute Interference" and "Scientific Proof" series?

04:25PM

8 A. No.

04:25PM

9 Q. Have you ever paid Dennis Montgomery any money?

04:25PM

10 A. Absolutely.

04:25PM

11 Q. What? How much?

04:25PM

12 A. A lot.

04:25PM

13 Q. How much?

04:25PM

14 A. Couple million.

04:25PM

15 Q. And what did you pay him a couple million
16 dollars for, sir?

04:25PM

17 A. For part of his company, Bixware. I think the
18 other one's called eTreppid. It's a compression
19 technology. And then also to -- to keep going to --
20 further to keep -- to keep going to -- he has to
21 extrapolate all of the states, all of the cities and
22 all the -- all the counties out individually, one at a
23 time. It takes time, the computers roll, and that's all
24 the data.

04:25PM

04:25PM

04:26PM

04:26PM

04:26PM

04:26PM

04:26PM

04:26PM

25 Q. Okay. Just so the record's clear, Mr. Lindell,

04:26PM

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1 you don't consider Dennis Montgomery to be a con artist;
2 is that right?

3 A. What's that? No. He's one of the most
4 brilliant men I've ever met in my life. Probably the
5 smart -- probably one of the top five smartest men in
6 history.

7 Q. Do you consider Dennis Montgomery to be a scam
8 artist, sir?

9 A. Huh-uh. Absolutely not.

10 Q. Do you consider him to be a liar?

11 A. No.

12 Q. Do you consider him to be a criminal?

13 A. No.

14 Q. Are you aware of any illegal activities that
15 Dennis Montgomery has engaged in?

16 A. He -- it shows -- you guys -- everybody showed
17 me here today that he had something with Caesars Palace
18 with some marker, and that's the only thing I've ever
19 heard about him. He owed Caesars Palace -- I've been in
20 that world.

21 Q. And the information from Dennis Montgomery is
22 based on Hammer and Scorecard, correct?

23 A. The what?

24 Q. Is based on Hammer and Scorecard, correct?

25 A. The data?

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1 Q. Yes.

04:27PM

2 A. He pulled -- he pulled all the data from the
3 2020 election from -- he pulled the data. So he -- he
4 basically made a copy of it, which our government should
5 have been doing, I guess.

04:27PM

04:27PM

04:27PM

04:27PM

6 Q. Now, back to CISA's website -- or let me just
7 ask you this: Prior to February 5th, 2021, did you do
8 anything to educate yourself on information that CISA
9 made publically available about the security of the 2020
10 election?

04:27PM

04:27PM

04:27PM

04:27PM

04:27PM

11 A. Now, I did go to John Ratcliffe. I believe
12 that was the DNI, though. I did investigate that
13 because John was the -- I think he was head of the
14 Department of National Intelligence, whatever it was --
15 I think it's called DNI.

04:27PM

04:27PM

04:27PM

04:27PM

04:27PM

16 And he came out with a statement on
17 January 7th that China hacked into -- that they had
18 been -- intruded in our election or something like that
19 and it validated -- that was on January 7th, but it kind
20 of got lost in all the January 6th stuff.

04:27PM

04:27PM

04:27PM

04:27PM

04:28PM

21 And John Ratcliffe made that statement, and
22 I'm going, wow, there's more evidence that China was
23 involved in -- with these computers. But I don't think
24 he works for CISA. He worked for the DNI.

04:28PM

04:28PM

04:28PM

04:28PM

25 Q. Okay. Anything else besides what you just

04:28PM

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1 mentioned?

04:28PM

2 A. Before the 5th?

04:28PM

3 Q. Yes.

04:28PM

4 A. I hired guys to dive into it, Dennis

04:28PM

5 Montgomery. I wanted to find out why all these people

04:28PM

6 voted in these states. His evidence validated exactly

04:28PM

7 what I already had, but nobody could explain it. You

04:28PM

8 can't explain it to this day if I had it here.

04:28PM

9 Just like John Merrill couldn't explain in

04:28PM

10 Alabama how you have 4,660 people voted over 110 years

04:28PM

11 old. They didn't vote. Their names were used.

04:28PM

12 That's -- I don't know why anybody doesn't say, hey,

04:28PM

13 let's look into this, you know.

04:28PM

14 That's all I did. I did my due diligence,

04:28PM

15 and I did it for three years. Then cast vote records

04:28PM

16 came out. They didn't even -- validation after

04:29PM

17 validation after validation.

04:29PM

18 MR. KACHOUROFF: What number was the last

04:29PM

19 one? I'm sorry.

04:29PM

20 MS. WRIGLEY: 633.

04:29PM

21 MR. KACHOUROFF: I'm fading. Good for you.

04:29PM

22 A. It kind of gets tiring when you say -- you

04:29PM

23 bring up stuff like this about people saying there's --

04:29PM

24 Mike, there's no evidence --

04:29PM

25 MR. KACHOUROFF: Mike. Mike.

04:29PM

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1	THE WITNESS: I'm going to state this for	04:29PM
2	the record.	04:29PM
3	A. There are people who have been constantly	04:29PM
4	saying to me, there's no evidence, in court, there's no	04:29PM
5	evidence, there's no evidence. Mike, did you see this	04:29PM
6	guy said there's no evidence?	04:29PM
7	Nobody looked at my evidence. Let's look	04:29PM
8	at these people voted that didn't live in the states.	04:29PM
9	That's - nobody has looked at that and gave me an	04:29PM
10	explanation. Nobody. I said it.	04:29PM
11	MS. WRIGLEY: Move to strike as	04:30PM
12	nonresponsive.	04:30PM
13	THE WITNESS: They're looking for papers.	04:30PM
14	(Exhibit 634 marked.)	04:30PM
15	Q. (BY MS. WRIGLEY) Let me hand to you	04:30PM
16	Exhibit 634, sir.	04:30PM
17	MR. KACHOUROFF: 634?	04:30PM
18	MS. WRIGLEY: 634.	04:30PM
19	Q. (BY MS. WRIGLEY) This was also marked as an	04:30PM
20	exhibit to the complaint. It's a press release that was	04:30PM
21	put out on --	04:30PM
22	MR. KACHOUROFF: Same objections as my	04:30PM
23	previous ones.	04:30PM
24	Q. (BY MS. WRIGLEY) -- November 12th, 2020 --	04:30PM
25	A. Uh-huh.	04:30PM

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1 Q. -- on the Security & Infrastructure -- Security
2 Agency's website, CISA's website.

3 A. Uh-huh.

4 Q. Bottom left-hand corner indicates the place on
5 the web that it was printed from and the date of the
6 capture.

7 Sir, have you ever seen this joint
8 statement --

9 A. No.

10 Q. -- that was put out?

11 A. No.

12 Q. Did you ever bother to look at any public
13 statements?

14 A. No. I was just looking at states that said
15 they had people that voted that didn't live there.
16 That's what I was looking at. And nobody can ever
17 explain that to me.

18 Q. Okay.

19 A. And CISA wouldn't explain it to me either.
20 They just said everything -- all is well.

21 Q. Let me go through this --

22 A. What's that?

23 Q. -- and see if it refreshes your recollection.

24 The title of this, you see at the top, is
25 "Joint Statement from Elections Infrastructure

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1 Government Coordinating Council & the Election

04:31PM

2 Infrastructure Sector Coordinating Executive

04:31PM

3 Committees."

04:31PM

4 Do you see that?

04:31PM

5 A. Uh-huh.

04:31PM

6 Q. And then the first paragraph reads, "The

04:31PM

7 members of the Election Infrastructure Government

04:31PM

8 Coordinating Council Executive Committee, Cybersecurity

04:31PM

9 and Infrastructure Security Agency, CISA, Assistant

04:31PM

10 Director Bob Kolasky, U.S. Election Assistance

04:31PM

11 Commission Chair Benjamin Hovland, National Association

04:31PM

12 of Secretaries of State President Maggie Toulouse

04:31PM

13 Oliver, National Association of State Election Directors

04:31PM

14 President Lori Augino, and Escambia County, Florida,

04:31PM

15 Supervisor of Elections David Stafford, and the members

04:31PM

16 of the Election Infrastructure Sector Coordinating

04:31PM

17 Council Chair Brian Hancock, Vice-Chair Sam Derheimer,

04:31PM

18 Chris Wlaschin, Ericka Hass, and Maria Bianchi released

04:31PM

19 the following statement."

04:32PM

20 Do you see that, sir?

04:32PM

21 A. Uh-huh.

04:32PM

22 Q. Were you aware that there were a number of

04:32PM

23 federal agencies or officials that had reached a joint

04:32PM

24 statement in November of 2020?

04:32PM

25 A. No, I wasn't, but if I was, I would have said

04:32PM

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1 explain all these people that voted that didn't live in 04:32PM
2 these states. Hundreds, if not millions, of people. 04:32PM
3 That's what I would have said. 04:32PM

4 Nothing they could have said would have 04:32PM
5 changed my mind because I have my own evidence, and 04:32PM
6 nobody would -- and I'm not going to change anything on 04:32PM
7 that just because they say that. They didn't see what 04:32PM
8 I -- they didn't look at what I see -- what I had. They 04:32PM
9 couldn't explain it. 04:32PM

10 Q. Did you -- 04:32PM

11 A. They can sit there and tell me it was a safe 04:32PM
12 election all they want, but they're not going to change 04:32PM
13 my mind. Then explain these people that voted -- it 04:32PM
14 hadn't happened in other elections to that magnitude. 04:32PM
15 It was crazy. 04:32PM

16 Q. Mr. Lindell, do you see where the statement 04:32PM
17 indicates, "The November 3rd election was the most 04:32PM
18 secure in American history. Right now across the 04:33PM
19 country election officials are reviewing and 04:33PM
20 double-checking the entire election process prior to 04:33PM
21 finalizing the result. When states have close 04:33PM
22 elections, many will recount ballots. All the states 04:33PM
23 with close results in the 2020 presidential race have 04:33PM
24 paper records of each vote, allowing the ability to go 04:33PM
25 back and count each ballot, if necessary. There is an 04:33PM

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1 added benefit for security and resilience. This process
2 allows for the identification and correction of any
3 mistakes or errors. There is no evidence that any
4 voting system deleted or lost votes, changed votes, or
5 was in any way compromised."

6 Do you see that?

7 A. Now, are you aware Arizona hadn't even finished
8 counting their votes when they were putting this out?

9 Q. Sir, are -- were you aware that there was a
10 joint statement issued --

11 A. No, absolutely not. I told you what I was
12 doing. Absolutely not.

13 Q. Sir, let's -- this was 634.

14 A. I made everything I did on my own due
15 diligence, my own evidence. I can't believe they put
16 out a statement before the election is done. That's
17 weird. I didn't know about that. I would have
18 questioned that back then for sure. How can you say
19 it's a fair election when it wasn't even over? They
20 were still counting votes until November 14th.

21 Q. I'm going to show you another document, sir.

22 (Exhibit 635 marked.)

23 Q. (BY MS. WRIGLEY) This is 635, sir, previously
24 attached to the complaint as Exhibit 51.

25 A. Okay.

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1 Q. I'll represent that it's a press release issued 04:35PM
2 from the Secretary of State of Michigan on January 5th, 04:36PM
3 2021. 04:36PM

4 Before I ask you about this exhibit, let me 04:36PM
5 ask you prior to -- 04:36PM

6 MR. KACHOUROFF: Same objections as the 04:36PM
7 previous. 04:36PM

8 Q. (BY MS. WRIGLEY) Prior to January 5th, 2021, 04:36PM
9 did you ever go to the website of the Secretary of State 04:36PM
10 of Michigan to see what information it released publicly 04:36PM
11 about the 2020 election? 04:36PM

12 A. No, but I did search Michigan's websites, their 04:36PM
13 election websites, because that's when I found out they 04:36PM
14 counted the votes in Michigan the morning of the 3rd, 04:36PM
15 not the lie they told us in the middle of the night on 04:36PM
16 the 4th when 106,000 came out for Biden and Jocelyn 04:36PM
17 Benson could not explain that. Her office could not 04:36PM
18 explain that. 04:36PM

19 Q. So let me ask you the same question. Prior to 04:36PM
20 February 5th, 2021, did you ever go to the website of 04:36PM
21 Secretary of State of Wisconsin to see the 04:36PM
22 information -- 04:36PM

23 A. I went to their election site, Wisconsin 04:36PM
24 election site. You have to go there to get results and 04:37PM
25 stuff. 04:37PM

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1	Q. The Wisconsin website?	04:37PM
2	A. Yes.	04:37PM
3	Q. And the --	04:37PM
4	A. No. No. No. This is the Michigan. Michigan.	04:37PM
5	Q. Okay. I -- so let me just make sure my --	04:37PM
6	A. This is Michigan. I'm sorry.	04:37PM
7	Q. Prior to February 5th --	04:37PM
8	A. Right.	04:37PM
9	Q. -- 2021, did you go to the website of the	04:37PM
10	Secretary of State of Michigan to get information about	04:37PM
11	the 2020 presidential election?	04:37PM
12	A. Yes.	04:37PM
13	Q. Okay. And --	04:37PM
14	A. And I found what I needed.	04:37PM
15	Q. Same question for Wisconsin. Did you go to the	04:37PM
16	Wisconsin website?	04:37PM
17	A. Uh-huh.	04:37PM
18	Q. How about Pennsylvania?	04:37PM
19	A. I don't -- yes, I did Pennsylvania, too,	04:37PM
20	because Pennsylvania had more votes than voters, and no	04:37PM
21	one has ever been able to explain that. 80,000 more	04:37PM
22	votes than voters, and nobody can explain that. And	04:37PM
23	they turned in their electors. It's against the law.	04:37PM
24	Q. What about Nevada, sir?	04:37PM
25	A. Yes, definitely Nevada, because that -- that's	04:37PM

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1 where all the people voted that don't live there. That
2 was the first state I found, 12,000 people who --

3 Q. Arizona?

4 A. Absolutely. I went to almost every state's
5 website.

6 Q. Georgia?

7 A. Yep.

8 Q. Okay. And so for each of those states --

9 A. Alabama, Missouri, Indiana, Illinois.

10 Q. For any of the states' websites you visited to
11 get information about the 2020 election prior to
12 January 5th, 2021, would you have reviewed public
13 releases by the secretaries of state from those
14 individual states?

15 A. No. I didn't care about their little
16 statements. I cared about the corruption. I cared
17 about what the facts were. Like in Michigan, a hundred
18 and six votes came down, and they said they were mail-in
19 votes. I wanted to see what they had to say about that.
20 Turns out it was the morning of the 3rd.

21 I went to Pennsylvania's website. I didn't
22 listen to their statements. They didn't have a
23 statement. They couldn't explain more votes than
24 voters.

25 I went to Georgia, and Georgia was so

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1 bad -- it was like crazy. I mean, they had all -- even 04:38PM
2 that phone call, all the stuff. Everything I looked for 04:38PM
3 was to explain how you had more -- people voted there 04:38PM
4 that didn't live there. 04:38PM

5 Wisconsin was a mess. 04:38PM

6 Nevada was the first state, by the way, 04:38PM
7 when I went to their website, where there was -- I think 04:39PM
8 it's -- it was over 10,000 people that voted that didn't 04:39PM
9 live in Nevada. 04:39PM

10 Now, Nevada has a law you have to be a 04:39PM
11 resident for 30 days, and I thought are people that -- 04:39PM
12 you know, at first I thought, wow, are there that many 04:39PM
13 people cheating? And then I found out -- then I started 04:39PM
14 checking other states. 04:39PM

15 MR. KACHOUROFF: Mike, let her finish. 04:39PM
16 She's going to ask another question. 04:39PM

17 THE WITNESS: She asked me. I did go to 04:39PM
18 all these sites. 04:39PM

19 MR. KACHOUROFF: Yeah, then tell her that. 04:39PM
20 So the answer is yes. 04:39PM

21 Q. (BY MS. WRIGLEY) Now, if you look at Exhibit 04:39PM
22 635, sir, this is a press release from January 5th, 2021 04:39PM
23 by Secretary of State Jocelyn Benson. 04:39PM

24 Do you see that? 04:39PM

25 A. Uh-huh. 04:39PM

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1 Q. Do you see the title of this is "Michigan's
2 election was secure and fair and the results are
3 accurate," right?

4 A. Uh-huh.

5 Q. Now, did Secretary of State Jocelyn Benson lie
6 in putting out this press release?

7 A. A hundred percent in my mind because I already
8 knew on their own website that those votes were not
9 counted in the middle the night like she said they were.
10 She said those were the mail-in votes, and she lied.
11 They were counted on the morning of the 3rd. So she
12 lost all credibility with me. All credibility. Her
13 statement -- what a liar. How can you have a secure
14 election --

15 And by the way, Michigan broke the law.
16 She did. She sent out 6 million ballot registrations
17 illegally that -- the legislatures make those laws, not
18 the Secretary of State. She did it and said, well, it's
19 the China virus. So we're going to stick out all these
20 ballots. They dumped 6 million of them all over
21 Michigan, and that was illegal. Her Attorney General
22 did not go after her. We went after her so much, many
23 people did, and won so many cases against her.

24 But I knew this -- on this day when this
25 came out, which was January 5th, she had already broke

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1 the public's trust by lying and saying those were
2 mail-in votes on the morning of the --

3 Q. Excuse me, Mr. Lindell.

4 Mr. Lindell, let me ask you: You're aware
5 that the Trump campaign filed a number of lawsuits
6 challenging the results of the 2020 election at the end
7 of 2020, correct?

8 A. I have no idea what all they did. I just know
9 what I did.

10 Q. Okay. Were you following the lawsuits that
11 were being filed at all?

12 A. Huh-uh. Nope. I was following my -- Rudy
13 Giuliani had a couple of things, but the media wasn't
14 there. So you never got to find out. There was only
15 one outlet there, RSBI. Any other time in history,
16 every outlet would be there. I thought that was weird.

17 I was doing my own thing. I was watching
18 Arizona so close. Arizona didn't make sense to me. I
19 was doing my own stuff with anomalies. I was getting my
20 own voter rolls, doing my own thing.

21 What they were doing out there -- they
22 didn't have what I had. I had something you can't
23 explain. That was the big thing.

24 Q. Mr. Lindell, in terms of any lawsuits that were
25 filed to challenge the results of the presidential

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1 election, you weren't following those lawsuits or the 04:41PM
2 results of the lawsuits -- 04:41PM

3 A. I never watched any of them. I was doing my 04:41PM
4 own thing because I was going into the heart of the 04:41PM
5 thing, the anomalies, the things that couldn't make 04:41PM
6 sense. How did Pennsylvania turn in votes and have more 04:41PM
7 votes than voters? It didn't -- 04:41PM

8 MR. KACHOUROFF: Again, hold on. Stop. 04:41PM

9 THE WITNESS: I -- 04:41PM

10 MR. KACHOUROFF: Mike. Mike, wait. 04:41PM

11 Objection, relevance. You're calling on 04:41PM
12 him to -- what -- argue about what the standing is in a 04:41PM
13 particular election case? Not the merits? You want him 04:41PM
14 to go over the merits of cases? Because there are none 04:41PM
15 of those cases. They're all -- 04:41PM

16 A. Yeah, I really didn't follow -- 04:41PM

17 MR. KACHOUROFF: Stop, Mike. We'll be here 04:41PM
18 all day if we keep doing this type of questioning. 04:41PM

19 Q. (BY MS. WRIGLEY) Were you following the 04:42PM
20 lawsuits challenging the results of the election? 04:42PM

21 MR. KACHOUROFF: Objection. 04:42PM

22 A. No, I -- 04:42PM

23 MR. KACHOUROFF: Stop. 04:42PM

24 Same objection. 04:42PM

25 A. No, I wasn't. I wasn't. I'm telling you I 04:42PM

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1 wasn't. The election was still going on. It didn't get
2 counted until here. I was doing my own thing. I didn't
3 know -- I heard there was -- none of them were ever
4 based on the merit. None of them had -- none of them
5 were based on merit. They were shoved out on standing
6 and all kinds of stuff.

7 (Exhibit 636 marked.)

8 Q. (BY MS. WRIGLEY) I'm going to show you another
9 document, sir. This is going to be 636. It's an
10 excerpt from a text exchange.

11 For the record, this is DEF 034862. It's a
12 text chain, which is long. It's over a hundred pages.
13 So we only have an excerpt here. The excerpt is Page 1,
14 128 through 133.

15 Looking at this exhibit, sir, do you see at
16 the top this is a text chain --

17 A. Uh-huh.

18 Q. -- between yourself and Kim Rasmussen?

19 A. Uh-huh.

20 Q. And I think you identified Ms. Rasmussen
21 earlier for the record.

22 A. Uh-huh.

23 Q. Do you remember that?

24 Can you just remind me who is Ms. --

25 A. What's that?

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1 Q. Can you remind me who is Kim Rasmussen? 04:43PM

2 A. She worked for me. She was -- worked for 04:43PM
3 MyPillow. She quit like three years ago, four years 04:43PM
4 ago. 04:43PM

5 Q. Now, this text message, if you look on Page 1, 04:43PM
6 starts on March 30th, 2020. Do you see that? 04:43PM

7 A. That's right. 04:43PM

8 Q. I'm going to jump to the second page, which is 04:43PM
9 Page 128 of this document produced. 04:43PM

10 A. Uh-huh. 04:43PM

11 Q. Do you see at the top there's a date 04:43PM
12 February 5th, 2021? It's on the top of the second page, 04:43PM
13 which is 128 of this. 04:43PM

14 A. Yes. 04:43PM

15 Q. And Ms. Rasmussen sent you a text, "When and 04:43PM
16 where can I see the documentary?" 04:43PM

17 Do you see that? 04:43PM

18 A. Uh-huh. 04:43PM

19 Q. And this is the date you did "Absolute Proof," 04:43PM
20 correct? 04:44PM

21 A. That's correct. 04:44PM

22 Q. You responded, "Tomorrow. Go to my website or 04:44PM
23 watch on OAN." 04:44PM

24 Do you see that? 04:44PM

25 A. That's right. Yep. 04:44PM

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1 Q. And she responds, "Thumbs up. I have chills.

04:44PM

2 I am watching it."

04:44PM

3 Do you see that?

04:44PM

4 A. Uh-huh.

04:44PM

5 Q. And you indicate, "I worked until 5:00 a.m."

04:44PM

6 Correct?

04:44PM

7 A. Right.

04:44PM

8 Q. And she responds, "Wow. Get some sleep. I

04:44PM

9 really like the set you're on."

04:44PM

10 Do you see that?

04:44PM

11 A. Uh-huh.

04:44PM

12 Q. You say, "I go on TV in 45 minutes and meet the

04:44PM

13 president in 2 hours."

04:44PM

14 Do you see that?

04:44PM

15 A. Uh-huh.

04:44PM

16 Q. And did you meet with President Trump on

04:44PM

17 February 5th, 2020?

04:44PM

18 A. No.

04:44PM

19 Q. No. Okay.

04:44PM

20 I'm going to have you jump to the next

04:44PM

21 page.

04:44PM

22 Do you see on the next page you and

04:44PM

23 Ms. Rasmussen continue to text back and forth?

04:44PM

24 A. "How much have you read?

04:44PM

25 Q. Do you see that, sir?

04:44PM

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1	A. What am I looking at here?	04:44PM
2	Q. You say, "How much have you read? Watched, I	04:44PM
3	mean."	04:44PM
4	At the top.	04:44PM
5	A. I don't know how much she read. I don't know	04:44PM
6	what she's talking about.	04:44PM
7	Q. If you go back to the prior page, I'm assuming	04:44PM
8	it's the documentary. It's still --	04:44PM
9	A. Well, you don't read a documentary.	04:44PM
10	Q. No, that's why you say, "How much have you	04:45PM
11	read? Watched, I mean."	04:45PM
12	A. Oh, watched. Okay. Got it.	04:45PM
13	Q. She says, "About 35 minutes. Your video is	04:45PM
14	down. Matt has a server you can put it on. The server	04:45PM
15	is with American Eagle who does the Super Bowl. Do you	04:45PM
16	think it crashed?"	04:45PM
17	Do you see that?	04:45PM
18	A. Yep.	04:45PM
19	Q. You respond, "The Eagle took it down. Go back	04:45PM
20	to the" --	04:45PM
21	A. "Website and start over."	04:45PM
22	Q. -- "website and start over."	04:45PM
23	Do you see that?	04:45PM
24	A. Yeah.	04:45PM
25	Q. And she says, "It's up."	04:45PM

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1 Do you see that?

04:45PM

2 A. Uh-huh.

04:45PM

3 Q. She also includes a link to a Business Insider
4 article at the bottom here.

04:45PM

5 Do you see that?

04:45PM

6 A. Uh-huh.

04:45PM

7 Q. It says, "Businessinsider.com," and then the
8 title is "MyPillow made three-hour film about election
9 fraud. Trump 2021."

04:45PM

04:45PM

04:45PM

10 A. Okay.

04:45PM

11 Q. Do you see that?

04:45PM

12 A. Yeah.

04:45PM

13 Q. And on the next page, do you see there's a
14 couple of images from the Insider with you on the phone,
15 sir?

04:45PM

04:45PM

04:45PM

16 A. Uh-huh.

04:45PM

17 Q. I want to mark that Business Insider article
18 for you that Ms. Rasmussen sent you in a text.

04:45PM

04:45PM

19 (Exhibit 637 marked.)

04:45PM

20 Q. (BY MS. WRIGLEY) This is going to be
21 Exhibit 637, sir.

04:45PM

04:45PM

22 A. This one is probably going to take longer than
23 five minutes, right?

04:46PM

04:46PM

24 Q. You have your call, right?

04:46PM

25 A. In about four minutes.

04:46PM

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1 Q. Okay. Yeah. Why don't we go off the record. 04:46PM

2 MR. KACHOUROFF: Okay. 04:46PM

3 A. I mean, I'll go a little extra, but I've got to 04:46PM
4 make this call. 04:46PM

5 THE VIDEOGRAPHER: Going off the record at 04:46PM
6 4:46. 04:46PM

7 (Short recess.) 04:46PM

8 THE VIDEOGRAPHER: And we're back on record 04:59PM
9 at 4:59. 04:59PM

10 Q. (BY MS. WRIGLEY) Mr. Lindell, I think you have 04:59PM
11 in front of you Exhibit 637, which is the Business 04:59PM
12 Insider article that was sent in the text from Kim 04:59PM
13 Rasmussen to yourself, and that was in Exhibit 636. 05:00PM

14 Have you reviewed this -- or have you read 05:00PM
15 this Business Insider article before? 05:00PM

16 A. I -- they write articles on me, about probably 05:00PM
17 a thousand of them in the last three years. I have no 05:00PM
18 idea. 05:00PM

19 Q. When Ms. Rasmussen texted it to you, would 05:00PM
20 you -- 05:00PM

21 A. Oh, she text -- this is the one she text me? 05:00PM

22 Q. Yes, it is, sir. When she texted that to you, 05:00PM
23 did you -- 05:00PM

24 A. Yeah, I'm sure I read it then. 05:00PM

25 Q. Okay. And do you see that the title of this 05:00PM

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1 article from the Business Insider is "MyPillow CEO Mike
2 Lindell is releasing a three-hour movie he made over the
3 past five days pushing a baseless election fraud claim
4 involving China"?

5 Do you see that?

6 A. Yeah. I'm not sure I said a baseless claim of
7 issues on election day.

8 Q. It's the title, whether you agree with it or
9 not.

10 Do you see that?

11 And the date from the article from this
12 Business Insider is February 5th, 2021.

13 Do you see that, sir?

14 A. Yeah.

15 Q. And it's got a picture of you in the front.

16 Do you see that?

17 A. Uh-huh.

18 Q. And the caption below the picture says,
19 "MyPillow CEO Mike Lindell outside the White House on
20 January 15th."

21 Do you see that?

22 A. Correct. Yes.

23 Q. And did you make a visit to the White House on
24 January 15th?

25 A. Yes, I did.

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1 Q. And did you talk with President Trump about 05:01PM
2 election fraud? 05:01PM

3 A. I brought him, I think to be signed, the gag 05:01PM
4 order that Dennis Montgomery was under so he could sign 05:01PM
5 that so that his evidence could be released to the 05:01PM
6 country. 05:01PM

7 Q. Was that gag order -- order signed by President 05:01PM
8 Trump? 05:01PM

9 A. No. He -- when I met with the president, he 05:01PM
10 said -- I talked to him about it and -- and then I had 05:01PM
11 an envelope that was a sealed envelope. 05:01PM

12 And I said, here, this also come from some 05:01PM
13 attorneys. And there was a guy named Robert -- Robert 05:01PM
14 O'Brien. He was sitting there, and the president 05:01PM
15 handed -- he opened up the envelope. He said take both 05:01PM
16 of these upstairs to the lawyers and see if there's 05:01PM
17 something to this, to Robert O'Brien. Robert O'Brien 05:01PM
18 brought me upstairs to the lawyers. 05:01PM

19 Q. And were you then allowed to go back and speak 05:01PM
20 with President Trump after talking with the lawyers? 05:02PM

21 A. No. I went up to the lawyers, and I showed 05:02PM
22 them -- I gave them the papers that the president had 05:02PM
23 opened up. It was recommendations from some lawyers. 05:02PM

24 The first one said fire Robert O'Brien, 05:02PM
25 which was the guy sitting right there that was going to 05:02PM